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AFFIDAVIT IN SUPPORT OF APPLICATION FOR A COMPLAINT

I, Joshua N. Rees, being duly sworn, depose and state as follows:

1. This affidavit is submitted in support of a criminal complaint for Bilal Mohammad Siddiqui, born in 1997, 13 Carmichael Court, Catonsville, Maryland 21228, for violations of Title 18 U.S.C. § 2251(a) (production of child pornography). The statements in this affidavit are based in part on information and reports provided by the Officers of the Fate (TX) Police Department, LiveMe, and Special Agents of the FBI, and on my experience and background as a Task Force Officer of the FBI. Since this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this investigation.

AGENT BACKGROUND

2. I am a Task Force Officer (TFO) with the Federal Bureau of Investigation (FBI), Baltimore Division, Baltimore, Maryland. I have been a TFO with the FBI since January 2016 and police officer with the Baltimore County Police Department since June 2001. Since March 2008, I have primarily investigated violations concerning child pornography and the sexual exploitation of children. I have gained experience through training in seminars, classes, and daily work related to conducting these types of investigations. Specifically, I have received FBI Crimes Against Children training, FBI Innocent Images Online Undercover training, and ICAC Peer-to-Peer Network Online Investigation training. I have participated in the execution of numerous search warrants, of which the majority have involved child exploitation and/or child pornography offenses. Many of the child exploitation and/or child pornography search warrants resulted in the seizure of computers, cell phones, magnetic storage media for computers, other electronic media, and other items evidencing violations of state and federal laws, including various

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sections of Title 18, United States Code § 2252A involving child exploitation offenses. I have also participated in the execution of numerous search warrants for online accounts, such as email accounts, online storage accounts and other online communication accounts related to child exploitation and/or child pornography. In the course of my employment with the Baltimore County Police Department and as a TFO with the FBI, I have observed and reviewed numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media and within online accounts.

LIVEME

3. LiveMe (also referred to as Live.Me) is a mobile phone/tablet application (app) available for Apple IOS and Android operating systems that allows users to live broadcast themselves over the Internet. The application's terms of use specify that the users must be at least 18 years old or have parental permission to use the app. Based on my knowledge, training, and experience, minors often lie about their age when setting up accounts that have an age restriction. Users can use their mobile phone number, Facebook, Instagram, or Twitter profile to register an account on LiveMe. There is a chat window that the viewer of a live broadcast can type real time messages that the broadcaster can see and reply in real time. Viewers can follow the broadcaster so they are aware when the broadcaster is live again, they can also re-watch a previous broadcast on the account of the broadcaster unless the broadcaster deletes the recording. The broadcasts can also be saved and the links can be shared with others. Viewers can also send virtual gifts using LiveMe coins that can be purchased from \$0.99 for 79 coins to \$99.99 for 19,999 coins. These virtual gifts can be converted into real money by the broadcaster. Based on my knowledge, training and experience minors are often "bribed" with gifts to expose themselves and engage in sexually explicit conduct while live broadcasting.

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PROBABLE CAUSE

4. On September 28, 2017, Det. Lt. Randy Jones of the Fate Police Department ("Fate PD") was contacted by the online watchdog group SheepdogBloodhound.org, an organization that fights the online exploitation of children, regarding a LiveMe account belonging to a prepubescent female, Jane Doe 1.¹ According to the information received, Jane Doe 1 was being enticed by other LiveMe users to expose her genitals and to masturbate. The online watchdog group emailed screenshots of Jane Doe 1's profile picture as well as two screenshots of the LiveMe session. One of the screenshots depicted the LiveMe user "Brody_venzitto" asking Jane Doe 1 to "Bent over" and "Show your behind." Det. Lt. Jones was able to identify Jane Doe 1, born in 2009, and seized numerous digital items from her residence, to include an Apple iPad used by Jane Doe 1. The Apple iPad was forensically examined.

5. I reviewed a portion of forensic data extracted from the iPad used by Jane Doe 1, and observed the following messages sent and received on September 28, 2017, with the user of the phone number 410-982-8015 (with my comments in brackets):

Jane Doe 1:	Hi it [Jane Doe 1's first name]
Jane Doe 1:	Hello?
410-982-8015:	Hey
410-982-8015:	Give me a minute
Jane Doe 1:	Ok
Jane Doe 1:	[an image sent of Jane Doe 1 wearing clothes]
Jane Doe 1:	You okay?
Jane Doe 1:	There's a pic (ghost emoji) [an image sent of Jane Doe 1 wearing only a black tank top shirt, with her legs spread and her vagina exposed. Jane Doe 1's left hand is touching her vagina and spreading it open.]
Jane Doe 1:	My mom is in bed now
Jane Doe 1:	Bye cya tomorrow
410-982-8015:	Ok night, make sure u goto photos and delete the pictures u sent me and delete our messages

¹ Although the Jane Doe 1's name and address are known, I will refer her as Jane Doe 1 throughout this affidavit to protect her identity.

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Jane Doe 1: Ok night
410-982-8015: Night

6. A subpoena was submitted to T-Mobile, the carrier of phone number 410-982-8015, requesting subscriber information. T-Mobile provided the following subscriber information for the phone number: Rafay Siddiqui, 13 Carmichael Court, Catonsville, Maryland 21228.

7. On October 11, 2017, Jane Doe 1 was interviewed and advised that she was asked to show her body and private parts on LiveMe. Jane Doe 1 described that she was conducting a live stream video of herself "working out." Jane Doe 1 explained that she was wearing pajamas and other LiveMe users asked her to show her underwear. Jane Doe 1 advised that she told the other users no and they continued to ask. Jane Doe 1 then left that live stream video and started a new live stream video. Jane Doe 1 advised that the same LiveMe users followed her to the new live stream video. Jane Doe 1 described how the other users told her to take her shirt off. Jane Doe 1 stated that three LiveMe users, "Brody," "Meow Daa," and "Savage Panda," were the users asking her to do this. Jane Doe 1 described how these users were communicating with her via the chat/text feature of LiveMe. Jane Doe 1 advised that after telling them that she would not remove her clothing, she eventually did what they asked because she wanted to be "cool and popular." Jane Doe 1 described how she was alone in her bedroom at her mother's house while her mother was a few houses away. Jane Doe 1 reported that Brody told her to take off her shirt, Meow Daa told her to show her panties, and Savage Panda told her to take off her pants. Jane Doe 1 stated that she could not see the other users, but they could see her private parts on the live video stream. Jane Doe 1 advised that Brody also contacted her on the Messages application and that she communicated with Brody via FaceTime that same night. Jane Doe 1 advised that she could not see Brody on her screen because his lights were off. Jane Doe 1 described Brody's voice as an older male. Jane Doe 1 stated that during several FaceTime video chats that night, Brody told her

to remove her pants, underwear, and shirt. She advised that she did this and that Brody could see her "private parts." Brody further instructed her to write on her body with a marker next to her "privates." Jane Doe 1 described how she used a gray marker to write on herself next to her "privates." She stated that he told her to write "a lot of letters that didn't spell anything." Jane Doe 1 then disclosed that Brody instructed her to use the restroom because he wanted to watch her pee. She advised that she did not actually urinate but he could see her private parts. The interviewer showed Jane Doe 1 a copy of the sent messages and images located on Jane Doe 1's iPad. Jane Doe 1 advised that Brody told her to show him pictures of her and her private parts. Jane Doe 1 advised that she deleted his entire contact from her iPad. Jane Doe 1 advised that Brody was the only person she communicated with from LiveMe after the live video stream. Jane Doe 1 advised that she told Brody she was 13 years old and lived in Colorado.

8. Fate PD sent a subpoena to LiveMe requesting subscriber information and IP addresses relating to the LiveMe account Brody_venzitto and for Jane Doe 1's account. LiveMe provided the subscriber information for Jane Doe 1's and Brody_venzitto's accounts, a copy of three videos created by Jane Doe 1 on LiveMe, IP connection logs for Jane Doe 1 and Brody_venzitto, and some of the direct messages from the individuals in the chat rooms with Jane Doe 1.

9. LiveMe provided the following information regarding the Brody_venzitto account:

Username:	Brody_venzitto
User ID:	846696975251800064
Country Code:	US
Registration Date & Time:	03/29/2017 04:14:18
Source of User:	Twitter

10. The following direct messages between the Jane Doe 1 and Brody_venzitto were located in LiveMe subpoena response in relation to Jane Doe 1's account:

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Jane Doe 1:	Ok
Brody_venzitto:	Do you have Skype or something?
Jane Doe 1:	No
Brody_venzitto:	Ok send me a txt message and I'll add you to my contacts
Jane Doe 1:	Ok I texted you

11. I reviewed the three LiveMe videos that were produced by Jane Doe 1 and provided by LiveMe. The first video, titled 15065568593764468345.mp4, is 27 minutes and 7 seconds in length. The second video, titled 15065547516522490779.mp4, is 21 minutes and 38 seconds in length. The third video, titled 15065607883594836650.mp4, is 3 minutes and 7 seconds in length. In each of the videos, Jane Doe 1 identifies her age as 13 years old several times. Jane Doe 1 is seen leaning into the camera and appears to be reading messages on the screen as she can be heard answering and reacting to the messages, such as, "Everyone is saying how cute I look, thank you." "Remove everything? Even my bra and panties?" I believe that Jane Doe 1 is reading messages sent by other users in the LiveMe video chat room, who are directing her activity, including directing her to undress and expose her genitals. During various points in the second and third videos, Jane Doe 1 exposes her vagina to the camera in a manner that makes her vagina the focal point of the video. Jane Doe 1 also touches her chest, touches her genitals, and uses her fingers to spread her vagina. At the end of the third video Jane Doe 1 is heard saying, "So go ahead and comment your number Brody. Ok, I'll DM you, but you have to follow me." She ends the video by saying, "So I'm going to go ahead and end this and talk to Brody, so bye guys."

12. After reviewing the videos from LiveMe and the images from the iPad, I concluded, based on my training and experience, that they contain visual depictions of a minor engaging in sexually explicit conduct and are child pornography under 18 U.S.C. § 2256(8).

13. LiveMe's response also included various login IP addresses connected to the Brody_venzitto account. One of the IP addresses, 96.244.92.248, logged into the account

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numerous times between July 20, 2017 and September 29, 2017. A public database query determined that the IP address was managed by Verizon. Verizon provided records which establish that on September 28, 2017, the IP address was assigned to: Rafay Siddiqui, 13 Carmichael Court, Catonsville, Maryland 21228.

14. In July 2018, an administrative subpoena was sent to LiveMe for recent subscriber information and IP addresses for the account the Brody_venzitto. LiveMe provided the following information regarding the Brody_venzitto account:

Username:	Brody_venzitto
User ID:	846696975251800064
Country Code:	US
Registration Date & Time:	03/29/2017 04:14:18
Source of User:	Twitter

15. LiveMe's response also included various login IP addresses connected to the Brody_venzitto account between April 24, 2018, and July 11, 2018. Three of the IP addresses that logged into the account numerous times were managed by Verizon. Verizon provided records which establish that the three IP addresses were assigned to: Rafay Siddiqui, 13 Carmichael Court, Catonsville, Maryland 21228.

16. I accessed LiveMe.com and conducted a search for users by searching the username Brody_venzitto. The search yielded one result, Brody_venzitto ID: 12830991. This account has a profile picture of what appears to be a white teenage male standing with a bicycle.

17. On September 4, 2018, a search warrant for the residence 13 Carmichael Court, Catonsville, Maryland 21228, was applied for and granted by Magistrate Judge Beth P. Gesner in the District of Maryland. On September 5, 2018, the search warrant was executed.

18. During the execution of the search warrant, Bilal Siddiqui ("Siddiqui") waived his Miranda rights and consented to an interview, which was audio recorded. During the interview,

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Siddiqui confirmed his phone number was 410-982-8015. He advised that no one besides him uses his phone. Siddiqui stated that his phone was locked and that no one else had the passcode. Siddiqui confirmed that he used LiveMe and that the app is currently installed on his phone. Siddiqui advised that he first used LiveMe about 2 years ago. He stated that he used it for about a year before deleting the app. Siddiqui advised that he recently put the LiveMe app back on his phone and began using it again. Initially, Siddiqui reported that he only had one LiveMe account, BigBoyBilal, however as the interview progressed Siddiqui admitted that the Brody_venzitto LiveMe account was his. Siddiqui advised that the profile picture for Brody_venzitto was actually of a high school classmate of his that he obtained online and that the classmate was a teenager at the time of the photo.

19. Siddiqui was shown a screen capture printout from a video of 8 year-old Jane Doe 1 where Brody_venzitto types to her, "Bent over" and, "Show your behind." Siddiqui admitted that he typed those words to Jane Doe 1. Siddiqui was shown printed pictures of Jane Doe 1's face and asked how old he thought she was. Siddiqui at first said that he thought she was 14-15 years old, and then later said that he thought she was 13 years old. Siddiqui was then shown a printed out image of Jane Doe 1 with her pants pulled down, bent over with her buttocks and vagina facing the camera and her face looking back towards the camera through her legs. I asked him if this is what she did after he told her to "Bent over" and "Show your behind," and Siddiqui advised, "it probably is."

20. Siddiqui acknowledged that he texted with Jane Doe 1 and video chatted with her on FaceTime. He admitted that on FaceTime he asked her to video herself using the bathroom. He also admitted that he requested nude images of Jane Doe 1 via text message and then he

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received those images from her. Siddiqui also admitted that he directed her to delete the images and their conversations.

21. During the execution of the search warrant, an Apple iPhone was located in the basement of the home where Siddiqui slept. Siddiqui identified this phone as belonging to him. The iPhone was forensically examined and videos were located on Siddiqui's phone of Jane Doe 2, a minor female, engaging in sexually explicit conduct. Siddiqui was shown some of the video thumbnails located on his cell phone. Siddiqui advised that he recognized Jane Doe 2 and estimated her age to be 11-12 years old. He advised that Jane Doe 2 said that she was 14-16 years old. Videos of Jane Doe 2 were located on Siddiqui's iPhone, including videos depicting Jane Doe 2 touching her vagina with her hands, inserting objects into her vagina, and writing on herself with a marker. Siddiqui admitted that he instructed Jane Doe 2 to "touch her pussy" and to insert a hairbrush into her vagina. Siddiqui also stated that he told Jane Doe 2 to write "B I L A L", his first name, on Jane Doe 2's pubic area with a marker. Siddiqui admitted that he also instructed Jane Doe 1 to write his name on her body in the same way. Siddiqui stated that he began communicating with Jane Doe 2 using Snapchat. Siddiqui advised that he saved the videos of Jane Doe 2 to his iPhone by using a screen record feature of his phone. He estimated that he has 10 videos of this child on his phone. He stated that he began communicating with Jane Doe 2 sometime in August 2018 and communicated with her as recently as 2 days prior to the interview.

CONCLUSION

22. Based upon all of the information set forth in this application, I respectfully submit that there is probable cause to believe that Bilal Mohammad Siddiqui violated Title 18, United States Code, Section 2251(a) (production of child pornography).

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JS

23. I affirm under penalty of perjury that the facts and circumstances outlined in this affidavit are true and accurate to the best of my knowledge and belief.

TFOR
Task Force Officer Joshua N. Rees
Federal Bureau of Investigation

Sworn and subscribed before me
this 26 day of September, 2018

JMK
HONORABLE J. MARK COULSON
UNITED STATES MAGISTRATE JUDGE



FILED _____ ENTERED _____
LOGGED _____ RECEIVED _____

SEP 26 2018

AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND

BY

DEPUTY

[Signature]